



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
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August 5, 2013

Garry Griffith, P.E.
Georgia-Pacific LLC (GP)
951 County Street
Milan, MI 48160-9610

Subject: Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Former Plainwell Impoundment Time-Critical Removal Action (TCRA),

Mr. Griffith,

Pursuant to Paragraph 15h, Section VIII of the Administrative Settlement Agreement and Order on Consent from Removal Action Docket No.V-W-07-C-863 (AOC) for the Allied Paper/Portage Creek/Kalamazoo River Superfund Site we completed an inspection by boat of the Former Plainwell Impoundment on June 11, 2013 with representatives from Georgia-Pacific LLC (GP), Michigan Department of Environmental Quality (DEQ); Michigan Department of Natural Resources; Michigan Attorney General's Office; and the U.S. Fish and Wildlife .

During the inspection, EPA noted that there were no removal areas (RAs) which were undergoing or were under threat of catastrophic bank failure. However, we did note the following RAs, where erosion or threat of erosion may warrant further response actions under CERCLA in the long-term. These removal areas are:

- a) RA 2A has exposed residuals on the bank. Erosion is noted on the downstream 1/3 of RA 2A;
- b) There is a shoreline gap between 1A and 2A which also has exposed material (GP has indicated this area is not covered under the TCRA);
- c) RA 10A continues to have active erosion which may eventually threaten the impoundment which contains contaminated material;
- d) RA 7, RA 8, and RA 9b are under threat of erosion. These areas have been previously armored with coir log and rock but need to be supplemented to ensure rock is present up to the bank full elevation due to the unstable river channel. To address these concerns, GP plans on planting live willow in the buffer zone and landward of the existing rock bank armoring to further increase the density and depth of roots and increase the soil holding capability of the bank. This work will be completed in Fall 2013).

We also, observed rocks, which were applied to armor the banks (in 2012) at RA 4A and 6B, appear to be crumbling from the freeze thaw cycle. GP has indicated that they are investigating this matter.

In addition, EPA has completed its review of the following documents:

- 1) Former Plainwell Impoundment and Plainwell No. 2 Dam Area 2012 Bank Conditions Monitoring Report (Dec. 2012);
- 2) Former Plainwell Impoundment and Plainwell No. 2 Dam Area 2012 Bank Conditions Monitoring Report - Addendum 1 (Jan. 25, 2013);
- 3) Former Plainwell Impoundment and Plainwell No. 2 Dam Area 2012 Bank Conditions Monitoring Report - Addendum 2 (Documenting work on Feb. 14, 2013).
- 4) GEORGIA-PACIFIC LLC ALLIED PAPER, INC./PORTAGE CREEK/KALAMAZOO RIVER SUPERFUND SITE RESPONSES TO MDEQ COMMENTS ON FOUR DOCUMENTS RELATED TO BANK MONITORING IN THE FORMER PLAINWELL IMPOUNDMENT AND PLAINWELL NO. 2 DAM AREA (Dec., 2012).
- 5) GEORGIA-PACIFIC LLC ALLIED PAPER, INC./PORTAGE CREEK/KALAMAZOO RIVER SUPERFUND SITE RESPONSES TO USEPA COMMENTS ON BANK MONITORING IN THE FORMER PLAINWELL IMPOUNDMENT AND THE PLAINWELL NO. 2 DAM AREA (DEC., 2012),

GP has also provided a summary of maintenance activities performed at the Former Plainwell Impoundment during the 3-year post-construction operations, maintenance and monitoring (OM&M) period (See Enclosure).

Based on our review of the aforementioned documents and inspection of the RAs (Plainwell Impoundment) on June 11, 2013, we believe that GP has adequately addressed our concerns and approve the documents. We understand that GP will be planting live willow stakes at RAs 6B, 7, 8, and 9B in the Fall of 2013 as part to our response to comments.

At this time, Pursuant to Paragraph 18 of the AOC, EPA believes that the responsibility for conducting post-removal site control activities described in Section 5.6.2 and 5.6.5 of the Work Plan for the Former Plainwell Impoundment is now under the Michigan Department of Natural Resources.

Please feel free to contact me should you have any questions.

Sincerely,

Ramon Mendoza
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CC: P. Buckholtz, MDEQ
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Enclosure: Arcadis: Summary of Maintenance Tasks Completed at the Former Plainwell
Impoundment.